

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

## **MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jennifer Szczucinski, Assistant United States Attorneys for said District, and moves the Court to order the Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of the Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. The Defendant is charged with three counts of possession with intent to intent to distribute controlled substances, in violation of Title 21 U.S.C. § 841(a), and two counts of possession of one or more firearms in furtherance of a drug trafficking crime, in violation of Title 18 U.S.C. § 924(c). Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant as required and the safety of any other person and the community.

2. According to the St. Louis County Police Department (“SLCPD”), detectives were investigating the shooting of a 9-year-old child, which occurred on June 3, 2023. The vehicle used

in that shooting was identified as a red Volkswagen Passat. On June 6, SLCPD detectives were patrolling near a gas station at Dunn and Riverview and observed what the believed to be a drug deal in progress. One of the vehicles detectives observed was a red Volkswagen Passat. The Passat appeared to notice law enforcement was following it and drove off the gas station parking lot at a high rate of speed, speeding onto 270, then off at Bellefontaine. The Defendant was later identified as the driver of the Passat. When SLCPD detectives activated their lights and sirens in an effort to conduct a traffic stop, the Defendant did not stop, instead, he fled thru traffic lights and stop signs and into oncoming traffic. Ultimately, SLCPD detectives were able to deploy a spike strip, which deflated the tires. However, the Defendant did not stop the Passat. Instead, he threw a bag out the window. This bag was retrieved and determined to contain a large quantity of fentanyl capsules. Eventually, the Passat became disabled and the Defendant and three other men fled from the Passat. As the Defendant fled, SLCPD detectives saw he was carrying a pistol and a backpack. When trying to jump a fence, the Defendant dropped the pistol. He was arrested shortly thereafter. The gun was identified as a Glock 22 .40 caliber pistol. The Glock pistol was fitted with a Glock switch, rendering it a fully-automatic firearm, and a drum magazine loaded with 32 rounds of ammunition. Inside the backpack was methamphetamine, fentanyl, and drug paraphernalia. A search of the Passat revealed a stolen Glock 22 .40 caliber pistol between the driver's seat and center console, a Glock 35 .40 caliber pistol under the front passenger seat, a box of .40 caliber ammunition in the glove box, 4 cell phones in the front cup holder, 1 cell phone in the console, and 2 cell phones in a bag on the back seat.

3. On June 7, 2023, after identifying the Defendant's Passat as the vehicle involved in the shooting of the 9-year-old child, SLCPD detectives executed a state-level search warrant at the Defendant's residence. In the Defendant's bedroom, SLCPD located a KCI .40 caliber drum

magazine, a PMAG containing 300 Blackout cartridges, a Bushmaster 5.56 caliber semi-automatic rifle, two Apple iPhones, a Glock handgun magazine, a shoebox containing two bags of methamphetamine, a shoebox with over \$1500, and Jones' Missouri Identification card.

4. SLCPD detectives stated the Defendant is a known member of a gang, which is responsible for a number of violent crimes in St. Louis County.

5. There is a serious risk that the Defendant will flee, given the Defendant's flight from the scene in this case and the potential sentence the Defendant faces in this case.

6. The nature and circumstances of the offense charged reflect that there is a serious danger to the community that would be posed by the defendant's release. Further, there are no conditions or combination of conditions that will reasonably assure the Defendant's appearance as required.

WHEREFORE, the United States requests this Court to order the Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of the Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ Jennifer Szczucinski  
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Assistant United States Attorney